

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MALEEHA AHMAD, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 4:17-cv-2455-CDP
	)	
CITY OF ST. LOUIS, MISSOURI,	)	
	)	
Defendant.	)	

**JOINT PROPOSED SCHEDULE**

COME NOW the parties, by and through their attorneys, and respectfully submit a Joint Proposed Scheduling Plan pursuant to this Court's Order of March 12, 2018 (ECF No. 78):

I. **Scheduling Plan:**

1. The parties believe this case should be assigned to **Track 3** (complex).
2. All motions for joinder of additional parties or amendment of the pleadings should be filed no later than **Monday, July 30, 2018**.
3. Discovery should proceed in the following manner:
  - (a) The parties have discussed the exchange of electronically stored information and have agreed that the initial production of electronically stored information can be accomplished with PDF files, Excel files, paper photocopies, and/or screen prints. Should the need to produce other electronically stored information arise, the parties will confer in an effort to facilitate production in a mutually agreeable format.

- (b) The parties do not currently have any agreements in place for asserting claims of privilege. With regard to the protection of confidential material, the parties anticipate filing a motion for entry of a protective order **within 30 days** of the Court's issuance of a Case Management Order.
- (c) The parties shall make all disclosures required by Fed. R. Civ. P. 26(a)(1) no later than **Monday, July 16, 2018**.
- (d) Plaintiffs shall disclose all expert witnesses and shall provide reports required by Fed. R. Civ. P. 26(a)(2) no later than **Friday, December 28, 2018**. Plaintiffs shall make expert witnesses available for deposition no later than **Friday, January 18, 2019**.
- (e) Defendants shall disclose all expert witnesses and shall provide reports required by Fed. R. Civ. P. 26(a)(2) no later than **Friday, February 15, 2019**. Defendants shall make expert witnesses available for deposition no later than **Friday, March 8, 2019**.
- (f) Any rebuttal experts shall be disclosed no later than **Monday, April 1, 2019**, and rebuttal reports required by Fed. R. Civ. P. 26(a)(2)(B) and (C) shall be provided no later than **Monday, April 1, 2019**. Rebuttal experts shall be made available for deposition no later than **Monday, April 15, 2019**.
- (g) The parties agree that, in general, discovery should not be conducted in phases or limited to certain issues. However, the parties believe that interrogatories and depositions may need to

be phased. That is, the parties believe that the presumptive limits on interrogatories and depositions should not apply to this case and, instead, recommend that the Court set a **current** limit of **thirty (30) interrogatories per side and thirty (30) depositions per side**. The parties anticipate that, after that initial phase, either or both parties may require further interrogatories or depositions and, at this time, they do not expect to oppose any party's motion for leave from this Court to take further depositions or send more interrogatories. In accordance with Section 3.c.vi of the Court's Rule 16 Order (ECF No. 78), the parties believe that a variance from the presumptions set forth in Fed. R. Civ. P. 30(a)(2)(A) is warranted because this is a putative class action and the evidence presented at the preliminary injunction hearing demonstrates that there are hundreds of witnesses to the alleged conduct complained of, including both private citizens and employees of Defendant. To date, counsel for Plaintiffs has communicated directly with more than 55 people who potentially have discoverable information.

(h) The parties shall complete **all** discovery in this case no later than **Monday, April 29, 2019**.

4. Referral to mediation is ongoing. Should current mediation efforts be unsuccessful and should the referral end, the parties believe that renewal of the referral would be appropriate after **Monday, April 1, 2019**.

5. Any dispositive motion must be filed no later than **Monday, April 29, 2019**. Response for any such motion will be due within **21 days** of filing the motion. A reply is due within **14 days** of filing the response.

II. Trial. The parties agree that this case should reasonably be expected to be ready for trial on or after **Monday, August 26, 2019**. It is anticipated that the length of time to try the case is approximately **ten days**.

Respectfully submitted,

/s/ Anthony E. Rothert  
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**ATTORNEY FOR DEFENDANT  
CITY OF ST. LOUIS**

**Certificate of Service**

I certify that on April 27, 2018, a copy of the foregoing was electronically filed with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Anthony E. Rothert